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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

Esteban & Crystal Martinez,)	
)	
)	Case No. 12-05112-FLK7
Debtors.)	
)	MOTION FOR AUTHORIZATION TO
)	REDEEM PROPERTY & NOTICE
)	THEREOF

MOTION TO REDEEM PROPERTY

Come now the Debtor(s) above named, by and through their attorney, Thomas D. Nagle, and move for entry of an Order authorizing them to redeem the below described property pursuant to the terms set forth below.

(1) On December 3, 2012, Debtor(s) filed a petition for relief under chapter 7 of title 11, United States Code.

(2) A portion of Debtor's property consists of the following: range, I-pod (X2), laptop computer, TV stand, and a camera with lens.

(3) Best Buy/Capital One, N.A. (hereinafter Secured Creditor) is the holder of an allowed claim against the above entitled estate in the sum of \$5,400.00, secured by a lien on said property, as follows: Purchase money security interest in consumer goods

MOTION TO REDEEM PERSONAL PROPERTY
& NOTICE THEREOF – PAGE 1

(4) The said property is tangible, personal property intended primarily for personal, family, or household use.

(5) The debt secured by said lien is a dischargeable consumer debt.

(6) The property secured by the aforesaid lien is exempted under section 522 of Title 11 United States Code.

(7) Debtor(s) desires to redeem said property by paying to the Secured Creditor the amount of his allowed secured claim, to wit, the sum of \$500.00.

WHEREFORE, Debtor(s) move for entry of an order authorizing redemption of the said property upon payment to the Secured Creditor of the amount of \$500.00 and for such other relief as is just in the circumstances.

January 17, 2013

/S/ THOMAS D. NAGLE
THOMAS D. NAGLE (WSBA 12769)
Attorney for Debtor(s)

NOTICE OF MOTION AND OF RIGHT TO OBJECT

You are hereby notified that the Debtor has filed the Motion for Authority to Redeem Property set forth above. Unless you object in writing and file your objection with the United States Bankruptcy Court Clerk and serve it on the undersigned attorney for Debtor(s) within 18 days of the date of mailing of this document the Court may enter an order granting the relief

requested without further notice to you. If an objection is not filed and served within the time set forth above the Court may rule on the pleadings filed without oral argument and without further notice to you and enter an order granting the relief requested without further notice to you. Your failure to respond will be deemed to be your consent to such a determination by the court.

The address of the United States Bankruptcy Court where your objection may be filed is: Post Office Box 2164, Spokane, WA 99210-2164. You may serve your objection on the undersigned by mail at 222 East A Street, Suite 100, Yakima, WA 98901.

Dated: January 17, 2013

/S/ THOMAS D. NAGLE
THOMAS D. NAGLE (WSBA 12769)
Debtor(s) Attorney

MAILING DATE: January 17, 2013